

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK, Chapter 11**

**DEBORAH PARKER/CATHERINE CLARK
5241 GARDENDALE AVENUE N.E.
CANTON, OHIO 44714**

CASE NO. 09-50026 (REG)

**MOTION OF
INTERVENTION**

VS:

**MOTORS LIQUIDATION COMPANY, et al
f/k/a Genersl Motors Corp., et al.**

PROOF OF CLAIM

(Jointly administered)

**Affidavit of Deborah Parker
and Affidavit of Catherine
Clark Attached.**

**MEMORANDUM TO SUPPORT MOITON OF INTERVENTION
AND AFFIDAVIT OF
DEBORAH PARKER AND CATHERINE CLARK ATTACHED.**

Now comes the Plaintiff's Deborah Parker and Catherine Clark filing a Motion of Intervention, Proof of Claim, and Affidavit's Attached to protect our rights in the existing Bankruptcy Chapter 11 Case No: 09-50026 (REG) in United States Bankruptcy Court Southern District of New York of Motors Liquidation Company and its affiliated Debtors, after Motors Liquidation Company, (f/k/a General Motors) filed Chapter 11.

STATEMENT OF FACTS

On March 18, 2011 an order (the "**Confirmation Order**") (ECF No. 9941) confirming the Debtors' Second Amended Joint Chapter 11 Plan, and ECF No. 9836 (the "**Plan**"), was signed by the Honorable Judge Robert E. Gerber, United States Bankruptcy Judge, and entered by the Clerk of the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**") on March 11, 2011.

In April and May of 2011, I received information of Judgment Entry,

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("**Confirmation Order**") (ECF No. 9941) and ("**Plan**"), (ECF No. 9836) of Motors Liquidation Company and debtors (collectively, the ("**Debtors**"), which stated that if I have a claim arising from the rejection of executory contracts or unexpired leases pursuant to the Plan must be filed with the Bankruptcy Court and served upon the Debtors, the GUC Trust Administrator, the Asbestos Trust Administrator, the Environmental Response Trust Administrative Trustee, and the Avoidance Action Trust Administrator, at the addresses set forth in the Confirmation Order, on or before May 30, 2011, or be forever barred. In order for me to comply with the Judgment Entry ordered signed by the Honorable Judge Robert E. Gerber of the United States Bankruptcy Court of Southern District of New York, I will need a copy of the ("**Confirmation Order**") (ECF No. 9941) and ("**Plan**") (ECP No. 9836) as soon as possible, for additional information please call (330) 526-8203, Deborah Parker.

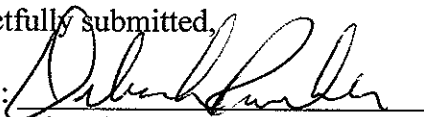
As Shareholders and heirs and loss of death, of brother, and uncle, Frank Williams, employee of General Motors, and as his heirs we are entitled to any stockholders shares, Asbestos claims, and any auto's purchased from General Motors, sustains, proof of all claims set forth in this pending bankruptcy, Case No. 09-50026 (REG).

Therefore the Plaintiff request that this Honorable Court's permission of Intervention as a party Plaintiff in this action of Bankruptcy Court Case No. 09-50026 (REG).

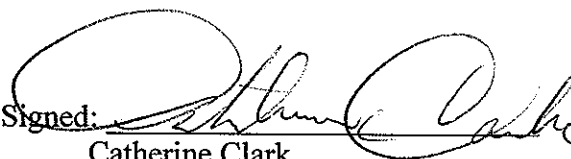
Thank you very much for your complete consideration in this matter.

Respectfully submitted,

Signed:


Deborah Parker

Signed:


Catherine Clark

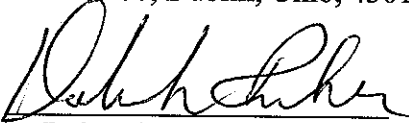
Twenty-Five Dollar filing fee included in this motion of Intervention.

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CERTIFICATE OF SERVICE

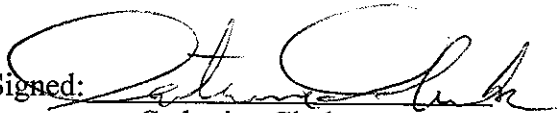
On May 24, 2011 a Motionn of Intervention and Proof of Claim was filed in over night express mail in Case No: 09-50026 with the United States Bankruptcy Court Southern District of New York by Deborah Parker/Catherine Clark vs. Motors Liquidation Company and f/k/a General Motors Corporation, and copies were sent to Weil, Gotshal & Manges LLP., at 767 Fifth Avenue, New York, New York 10153, and The Cardem City Group, Inc., P.O. Box 9386, Dublin, Ohio, 43017-4286.

Signed:



Deborah Parker

Signed:



Catherine Clark

CC:

United States Bankruptcy Court
Chambers of the Honorable Robert E. Gerber,
One Bowling Green, Room 621
New York, New York 10004-1408

Weil, Gotshal & Manges LLP, attorney for Debtors
Attention: Joseph H. Smolinsky, Esq.
767 Fifth Avenue
New York, New York 10153

The Garden City Group, Inc.
Attention: Motors Liquidation Company
P.O. Box 9386
Dublin, Ohio 43017-4286

Kramer Levin Naftalis & Frankel LLP,
Attention: Jennifer Sharret, Esq.
1177 Avenue of the Americas
New York, New York 10036

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APPENDIX

(LIST OF EXHIBITS)

The following Exhibit's are attached and incorporated to further support this motion:

- (A) Letter and Envelope of Notification of (I) Entry of Order Confirming Debtors Second Amended Joint Chapter 11 Plan (II) Occurrence of Effective Date.
- (B) Death Certificate Frank Williams employee of General Motors

EXHIBIT (A)

**LETTER AND ENVELOPE OF NOTIFI-
CATION OF (I) ENTRY OF ORDER
CONFIRMING DEBTORS SECOND
AMENDED JOINT CHAPTER 11 PLAN
(11) OCCURRENCE OF EFFECTIVE DATE.**

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	09-50026 (REG)
f/k/a General Motors Corp., et al.	:	
	:	
Debtors.	:	(Jointly Administered)

**NOTICE OF (I) ENTRY OF ORDER
CONFIRMING DEBTORS' SECOND AMENDED JOINT
CHAPTER 11 PLAN AND (II) OCCURRENCE OF EFFECTIVE DATE**

**TO ALL CREDITORS, EQUITY INTEREST HOLDERS,
AND OTHER PARTIES IN INTEREST:**

PLEASE TAKE NOTICE that an order (the "Confirmation Order") (ECF No. 9941) confirming the Debtors' Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (ECF No. 9836) (the "Plan"), of Motors Liquidation Company and its affiliated debtors (collectively, the "Debtors"), was signed by the Honorable Robert E. Gerber, United States Bankruptcy Judge, and entered by the Clerk of the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") on March 29, 2011.

PLEASE TAKE FURTHER NOTICE that the Confirmation Order is available for inspection during regular business hours in the office of the Clerk of the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004. The Confirmation Order is also available for registered users of the Bankruptcy Court's filing system by accessing the Bankruptcy Court's website (www.nysb.uscourts.gov) and for all parties at www.motorsliquidationdocket.com.

PLEASE TAKE FURTHER NOTICE that the Plan and its provisions are binding on the Debtors, Post-Effective Date Motors Liquidation Company, the GUC Trust Administrator,¹ the Asbestos Trust Administrator, the Environmental Response Trust Administrative Trustee, the Avoidance Action Trust Administrator, any entity acquiring or receiving property or a distribution under the Plan, and any holder of a claim against or equity interest in the Debtors, including all governmental entities, whether or not the claim or equity interest of such holder is impaired under the Plan and whether or not such holder or entity has accepted the Plan.

PLEASE TAKE FURTHER NOTICE that the Effective Date of the Plan (as defined in the Plan) occurred on March 31, 2011 and, as a result, the Plan has been substantially consummated.

PLEASE TAKE FURTHER NOTICE that all proofs of claim arising from the rejection of executory contracts or unexpired leases pursuant to the Plan must be filed with the Bankruptcy Court and served upon the Debtors, the GUC Trust Administrator, the Asbestos Trust Administrator, the Environmental Response Trust Administrative Trustee, and the Avoidance Action Trust Administrator, at the addresses set forth in the Confirmation Order, on or before May 30, 2011. Any claims arising from the rejection of an executory contract or unexpired lease for which a proof of claim has not been filed by such date shall be forever barred and shall not be enforceable against the Debtors, the GUC Trust Administrator, the Asbestos Trust Administrator, the Environmental Response Trust Administrative Trustee, and the Avoidance Action Trust Administrator, or any property to be distributed under the Plan, the GUC Trust, the Asbestos Trust, the Environmental Response Trust, and the Avoidance Action Trust, unless otherwise ordered by the Bankruptcy Court or provided in the Plan.

Dated: New York, New York
April 11, 2011

WEIL, GOTSHAL & MANGES LLP

Harvey R. Miller

Stephen Karotkin

Joseph H. Smolinsky

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in the Plan.

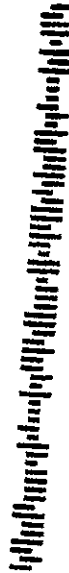
The Garden City Group, Inc.
Attn: Motors Liquidation Company
P.O. Box 9386
Dublin, Ohio 43017-4286

Important - Bankruptcy Court Document Enclosed



APS2460803962

1998226 /3578/1 *****AUTO**SCH 3-DIGIT 446
DEBORAH PARKER
CATHERINE CLARK JT
5241 GARDENDALE AVE NE
CANTON OH 44714-1075



PRESORTED
FIRST-CLASS MAIL
U.S. POSTAGE
PAID
CHICAGO IL
PERMIT NO. 941

EXHIBIT (B)

**DEATH CERTIFICATE OF FRANK
WILLIAMS EMPLOYEE OF GENERAL
MOTORS.**

UNCLERIFIED

CERTIFICATE OF DEATH

State File No.

Registrar's No.

850

1. DECEDENT'S NAME (First, Middle, Last) Frank Williams				2. SEX M		3. DATE OF DEATH (Month, Day, Year) May 18, 1989	
4. SOCIAL SECURITY NUMBER -5448		5a. AGE - Last Birthday (Years) 59		5b. UNDER 1 YEAR Months: Days: Hours: Minutes:		6. DATE OF BIRTH (Month, Day, Year) Dec. 6, 1929	
7. BIRTHPLACE (City and State or Foreign Country) Maryern, Ohio		8a. PLACE OF DEATH (Check only one) <input type="checkbox"/> HOSPITAL: <input type="checkbox"/> Inpatient <input checked="" type="checkbox"/> ER/Outpatient <input type="checkbox"/> DDA <input type="checkbox"/> OTHER: <input type="checkbox"/> Nursing Home <input type="checkbox"/> Residence <input type="checkbox"/> Other (Specify)					
9. FACILITY NAME (If not institution, give street and number) Timken Mercy Medical Center				10. CITY, VILLAGE OR LOCATION OF DEATH Canton		11. COUNTY OF DEATH Stark	
12. MARITAL STATUS - Married, Never Married, Widowed, Divorced (Specify) Never married		13. SURVIVING SPOUSE (If wife, give maiden name) None		14. DECEDENT'S USUAL OCCUPATION (Give kind of work done during most of working life. Do not use retired.) Inspector		15. KIND OF BUSINESS/INDUSTRY General Motors	
16a. RESIDENCE - STATE Ohio		16b. COUNTY Stark		16c. CITY, TOWN, OR LOCATION Waynesburg		16d. STREET AND NUMBER 7650 Goodland Road	
17. INSIDE CITY LIMITS? (Yes or No) NO		18. ZIP CODE 44688		19. WAS DECEDENT OF HISPANIC ORIGIN? (Specify No or Yes. If yes, specify Cuban, Mexican, Puerto Rican, etc.) <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes Specify: Black		20. DECEDENT'S EDUCATION (Specify only highest grade completed) Elementary/Secondary (0-12) 2 yrs.	
21. FATHER'S NAME (First, Middle, Last) Maudie Williams				22. MOTHER'S NAME (First, Middle, Maiden Surname) Liela Walker			
23. INFORMANT'S NAME (Type/Print) Catherine Clark				24. MAILING ADDRESS (Street and Number or Rural Route Number, City or Town, State, Zip Code) 3439 Dueber S.W. Canton, Ohio 44706			
25. METHOD OF DISPOSITION <input checked="" type="checkbox"/> Burial <input type="checkbox"/> Cremation <input type="checkbox"/> Removal from State <input type="checkbox"/> Donation <input type="checkbox"/> Other (Specify)		26. PLACE OF DISPOSITION (Name of cemetery, crematorium, or other place) Sandy Valley Cemetery		27. LOCATION - City or Town, State Waynesburg, Ohio		28. DATE OF DISPOSITION May 24, 1989	
29. NAME OF EMBALMER Richard A. Franklin		30. LICENSE NUMBER 7130-A		31. NAME AND ADDRESS OF FACILITY R.A. Franklin Funeral Home, Inc.		32. DATE FILED (Month, Day, Year) June 6, 1989	
33. SIGNATURE OF FUNERAL SERVICE LICENSEE OR PERSON ACTING AS SUCH <i>Richard A. Franklin</i>		34. LICENSE NUMBER (of Licensee) 6332		35. NAME AND ADDRESS OF FACILITY 683 S. Liberty Ave. Alliance, OH		36. DATE PERMIT ISSUED 5-23-89	
37. SIGNATURE OF PERSON ISSUING PERMIT <i>L. J. J. J.</i>		38. DIST. NO. 7601		39. DATE PERMIT ISSUED 5-23-89		40. CERTIFIER (Check only one) <input type="checkbox"/> CERTIFYING PHYSICIAN To the best of my knowledge, death occurred at the time, date, and place, and due to the cause(s) and manner as stated. <input checked="" type="checkbox"/> CORONER On the basis of examination and/or investigation, in my opinion, death occurred at the time, date, and place, and due to the cause(s) and manner as stated.	
41. TIME OF DEATH 9:38 PM		42. DATE PRONOUNCED DEAD (Month, Day, Year) May 18, 1989		43. WAS CASE REFERRED TO CORONER? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		44. SIGNATURE AND TITLE OF CERTIFIER <i>James R. Pritchard, D.O.</i>	
45. LICENSE NUMBER 2253		46. DATE SIGNED (Month, Day, Year) 5-2-89		47. NAME AND ADDRESS OF PERSON WHO COMPLETED CASE OF DEATH (Type/Print) JAMES R. PRITCHARD, D.O., STARK COUNTY CORONER, 400 AUSTIN, NW, MASSILLON, OHIO 44646			
48. PART I. Enter the diseases, injuries, or complications that caused the death. Do not enter the mode of dying, such as cardiac or respiratory arrest, shock, or heart failure. List only one cause on each line. IMMEDIATE CAUSE (Final disease or condition resulting in death) METASTATIC CARCINOMA OF THE LUNG DUE TO (OR AS A CONSEQUENCE OF): Sequentially list conditions, if any, leading to immediate cause. Enter UNDERLYING CAUSE (Disease or injury that initiated events resulting in death) LAST DUE TO (OR AS A CONSEQUENCE OF): DUE TO (OR AS A CONSEQUENCE OF):							
49. PART II. Other significant conditions contributing to death but not resulting in the underlying cause given in Part I.				50. WAS AN AUTOPSY PERFORMED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		51. WERE AUTOPSY RESULTS AVAILABLE TO COMPLETION OF CAUSE OF DEATH? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
52. MANNER OF DEATH <input checked="" type="checkbox"/> Natural <input type="checkbox"/> Pending Investigation <input type="checkbox"/> Accident <input type="checkbox"/> Could not be Determined <input type="checkbox"/> Suicide <input type="checkbox"/> Homicide		53a. DATE OF INJURY (Month, Day, Year)		53b. TIME OF INJURY M		53c. INJURY AT WORK? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
53d. PLACE OF INJURY - At home, farm, school, factory, office, building, etc. (Specify)		53e. DESCRIBE HOW INJURY OCCURRED		54. LOCATION (Street and Number or Rural Route Number, City or State)			

DO NOT WRITE IN MARGINS RESERVED FOR ODH DATA CODING

IF DEATH OCCURRED IN INSTITUTION, GIVE RESIDENCE BEFORE ADMISSION

SEE INSTRUCTIONS ON OTHER SIDE

HSA 2117
5152-06 Rev. 1/78

162.9

AFFIDAVIT OF
DEBORAH PARKER

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK, Chapter 11**

**DEBORAH PARKER/CATHERINE CLARK
5241 GARDENDALE AVENUE N.E.
CANTON, OHIO 44714**

CASE NO. 09-50026 (REG)

**MOTION OF
INTERVENTION**

VS:

**MOTORS LIQUIDATION COMPANY, et al
f/k/a Genersl Motors Corp., et al.**

PROOF OF CLAIM

(Jointly administered)

AFFIDAVIT OF

DEBORAH PARKER

STATE OF: OHIO)
) SS:
COUNTY OF: STARK)

I, Deborah Parker, being duly sworn, deposes and state:

1. I am shareholder and heir of Frank Williams, employee at General Motors Corp., the claims and noticing agent for the debtors and debtors possession (the "Debtors") in the above-captioned proceeding. My address is 5241 Gardendale Avenue, Canton, Ohio, 44714, phone number (330) 526-8203.

2. In April and May of 2011, I received a notice in Case No: 09-50026 (REG) Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective sent to all Creditors, Equity Interest Holders, and other parties in Interest, ("Confirmation Order") (ECF No. 9941 and ("Plan") ECF No. 9836,

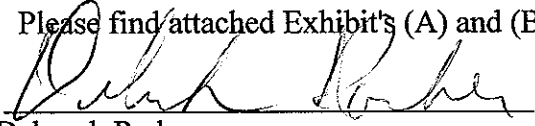
3. On May 24, 2011 I filed a Motion of Intervention and Proof of Claims to protest my rights as a Plaintiff party to file a claim of interest as a heir and stockholder

-2-

to all claims incorporated in this bankruptcy proceedings in over-night expressed mail.

4. Please find attached Exhibit's (A) and (B), proof of Claim.

Signed:


Deborah Parker

Sworn before me on this day 24th of May, 2011.

Notary Public

Signed:


Ernest Burkes, Sr.

My Commission Expires: _____

~~ERNEST BURKES, SR.~~
NOTARY PUBLIC • STATE OF OHIO
Recorded in Stark County
My commission expires Mar. 31, 2014

AFFIDAVIT OF
CATHERINE CLARK

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK, Chapter 11**

**DEBORAH PARKER/CATHERINE CLARK
5241 GARDENDALE AVENUE N.E.
CANTON, OHIO 44714**

CASE NO. 09-50026 (REG)

**MOTION OF
INTERVENTION**

VS:

**MOTORS LIQUIDATION COMPANY, et al
f/k/a Genersl Motors Corp., et al.**

PROOF OF CLAIM

(Jointly administered)

AFFIDAVIT OF

CATHERINE CLARK

STATE OF: OHIO)
) SS:
COUNTY OF: STARK)

I, Catherine Clark, being duly sworn, deposes and state:

1. I am shareholder and heir of Frank Williams, employee at General Motors Corp., the claims and noticing agent for the debtors and debtors possession (the "Debtors") in the above-captioned proceeding. Contact address is 5241 Gardendale Avenue, Canton, Ohio, 44714, phone number (330) 526-8203.

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3. On May 24, 2011 I filed a Motion of Intervention and Proof of Claims to protest my rights as a Plaintiff party to file a claim of interest as a heir and stockholder

-2-

to all claims incorporated in this bankruptcy proceedings in over-night expressed mail.

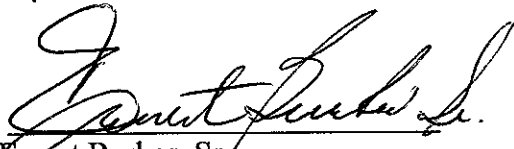
4. Please find attached Exhibit's (A) and (B), proof of Claim.

Signed: 

Catherine Clark

Sworn before me on this day 24 of May, 2011.

Notary Public

Signed: 

Ernest Burkes, Sr.

My Commission Expires: _____

ERNEST BURKES, SR.
NOTARY PUBLIC • STATE OF OHIO
Recorded in Stark County
My commission expires Mar. 31, 2014